



EASTERN RESEARCH GROUP, INC.

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Susan Radomski, Eastern Research Group (ERG), Morrisville

DATE: October 15, 1998

SUBJECT: Summary of the September 3, 1998 Meeting of the Industrial Combustion
Coordinated Rulemaking (ICCR) Incinerator Work Group (IWG)

1.0 INTRODUCTION

- The primary purpose of the meeting was to finalize the draft Regulatory Alternatives Paper (RAP) for presentation to the Coordinating Committee (CC) at its September meeting. Other meeting objectives included deciding what other materials need to be forwarded to the CC and wrapping up any remaining business. A complete meeting agenda is included as attachment 1.
- The meeting was held on September 3, 1998 in Research Triangle Park, North Carolina.
- A complete list of meeting attendees with their affiliations is included as attachment 2.

2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

- 2.1 IWG Announcements and Updates
- 2.2 Subteam Status Reports
- 2.3 Finalization of the RAP
- 2.4 Where do we go from here?
- 2.5 Action Items

2.1 IWG Announcements and Updates

- Rick Crume informed the IWG that Larry Faith of Shell Development Company has retired and will no longer be participating in the IWG.

- Rick Crume pointed out the reading materials to be reviewed and discussed by the IWG. Some of the materials require consensus by the IWG and others need agreement from the group before being submitted to the CC.
- Rick Crume reviewed the calendar of remaining IWG events. The calendar is included as attachment 3 and shows upcoming meetings and deadlines for submitting materials for posting to the TTN before the CC meeting.
- Jeff Shumaker of International Paper suggested that EPA arrange multiple tables to display all information available for review by the CC. He is concerned that making available only a single copy of each work product submitted to the CC may not allow everyone a chance to read them.
- Rick Crume reported that the IWG has time September 16 between 8:30 a.m. and 9:30 a.m. on the CC meeting agenda to discuss closure items such as the RAP. In addition, the IWG has time during the morning of September 17 to review additional information submittals to the CC.

2.2 Subteam Status Reports

- Subteam 3 outlined their final changes to the RAP attachments. The subteam determined that “finishing waste” is more similar to materials burned in industrial waste units than the wood and paper materials that make up their subcategories. Subteam 2 agreed to consider finishing wastes. Subteam 3 reported that they expect the population of their subcategories to remain relatively constant. They have seen no trends toward the building of new units or the shut down of existing units.
- Subteam 4 pointed out an editorial change to the RAP. Dana Worcester of the Association of Container Reconditioners reported that the subteam determined the national population shown in their information by calling facilities thought to own incineration units of interest.
- Subteam 1 reported that they have already submitted their testing recommendations to the CC and have completed lists of feasible pollution control options and good combustion designs and practices. The subteam discussed the possibility of subcategorizing crematories by either size or the materials burned. Ruth Mahr of Citizens Concerned About Medical Waste Incineration pointed out that the subteam does not have sufficient data to support either of the options and may use different groupings or none at all.
- Subteam 2 submitted their suggested subcategorization and reported that a large percentage of the units they reviewed have control devices, including good combustion practices and add-on controls. The IWG helped them edit their document, which will be submitted to Rick Crume for inclusion in the RAP.

2.3 Finalization of the RAP

- Following the subteam updates and suggestions for the RAP, several individuals suggested additional changes. Following further editing, the IWG reached closure on the current format of the RAP.

2.4 Where do we go from here?

- Rick Crume outlined the remaining work to be done by the IWG. Mr. Crume will make all required changes to the RAP and the IWG needs to prepare for the presentations to be given at the final Coordinating Committee meeting.
- Norm Morrow of Exxon Chemical Americas discussed the work he has completed on the IWG database. The database currently shows information from Survey Database Version 2 and Inventory Database Version 3. The consolidated listing shows all incineration units and the subteam for which they are currently listed. He plans to forward the completed work to Rick Crume for review in a few days.

2.5 Action Items

- Rick Crume will incorporate suggested changes to the RAP and submit the final product for posting to the TTN before the CC meeting.
- Beth Berglund will write language to complete the Subteam 2 information to be submitted to the CC and forward it to Rick Crume by September 4.
- Paul Rahill will submit to Rick Crume changes to the Subteam 1 work by September 4.

3.0 UPCOMING MEETINGS

- September 15: Abbreviated IWG meeting (optional) in Durham, North Carolina
- September 16 and 17: CC meeting in Durham, North Carolina

ICCR INCINERATOR WORK GROUP MEETING
September 3, 1998, Holiday Inn Raleigh-Durham
Research Triangle Park, North Carolina

Activities and Decisions

- Rick Crume pointed out the reading materials to be reviewed and discussed for consensus by the Incinerator Work Group (IWG) for submittal to the Coordinating Committee (CC). He also reviewed the calendar of remaining IWG events.
- Subteam 3 outlined their final changes to their RAP attachments and expressed a belief that the current information in the RAP concludes their work as a subteam.
- Subteam 4 pointed out an editorial change to the RAP and explained the subteam's method for determining the national population of units.
- Subteam 1 presented a status report containing documents to be included in the RAP, as well as information to be submitted to the CC in the documentation package. Following a break, the subteam presented additional language requested during earlier discussion, which was accepted by the IWG.
- The subteams worked on language to address issues raised during the subteam discussion and presented it to the IWG. Following the addition of the new language, closure was reached on the subcategory information for Subteams 3 and 4.
- Subteam 2 reviewed their information to be submitted. The IWG assisted with word smithing. A copy of the revised document will be given to Rick Crume to be included in the RAP.
- The IWG members discussed changes to the RAP until closure was reached. However, if the IWG members have further suggestions, they may call attention to them at the next IWG meeting in order to record these suggestions officially.
- The IWG agreed to pass the following items on to the CC:
 - Data information packages from all 4 subteams
 - Facility lists from all 4 subteams

from - Letter addressing issue of Childrens health
that Keith Harley and Norm Morrow's response to
 letter.

Upcoming Meetings

- The current Work Group meeting schedule is as follows:
 - September 15: Abbreviated IWG meeting, 2:00 p.m.
 Durham, NC.
 - September 16 and 17: CC meeting, Durham, NC.

Action Items

- Rick Crume will incorporate suggested changes to the RAP and submit the final product for posting before the CC meeting.
- Beth Berglund will write language to complete the Subteam 2 information to be submitted to the CC and forward it to Rick Crume on September 4.
- Paul Rahill will submit changes to the Subteam 1 work to Rick Crume by September 4.

ATTACHMENT 1

**FINAL AGENDA
ICCR INCINERATOR WORK GROUP**

AGENDA
INCINERATOR WORK GROUP MEETING
September 3, 1998 8:30 am to 4:00 pm
Holiday Inn/Raleigh-Durham Airport
Research Triangle Park, North Carolina

MEETING OBJECTIVES

- # **Finalize the Regulatory Alternatives Paper (RAP) for presentation to the Coordinating Committee at its September meeting.**
- # **Decide what other materials need to be forwarded to the Coordinating Committee.**
- # **Wrap up any remaining business.**

AGENDA

- 8:30 am Call to order and welcome -- *Rick Crume***
Approval of agenda -- *Scott Warner*
Review of meeting objectives -- *Norm Morrow*
- 8:45 am Announcements and updates -- *Rick Crume***
- 9:00 am Review and discussion of needs for finalizing the RAP (excluding subcategory definition sheets) and supporting documentation -- *Group***
- 9:30 am Subteam reports -- *Subteam Leaders***
 - 1. Status of latest RAP definition sheet revisions**
 - 2. Discussion of final recommendations and rationale**
 - 3. Review of supporting documentation**
 - 4. Recommended position on pollution prevention**
 - 5. Formal submittal of final subteam recommendations and materials**
 - 6. Identification of final follow-up items for completion prior to CC meeting**

10:15 am BREAK

10:30 am Subteam reports (continued)

11:45 pm LUNCH

1:00 pm Subteam reports (continued)

2:30 pm BREAK

2:45 pm Finalization of RAP for presentation to the CC -- *Group*

3:30 pm Where do we go from here ??? -- *Rick Crume*

3:45 pm Wrap-up

Agenda for optional meeting on September 15 -- *Norm Morrow*

Other business -- *Group*

Flash minutes -- *ERG*

4:00 pm Adjourn -- *Rick Crume*

ATTACHMENT 2

MEETING PARTICIPANTS

Meeting Participants

Name	Affiliation
Ethan Begg	Missouri Department of Natural Resources

Beth Berglund	Merck & Co, Inc.
Richard Crume	U.S. EPA/OAQPS
Ruth Mahr	Citizens Concerned about Medical Waste Incineration
David Marrack	Galveston-Houston Assoc. for Smog Prevention
Bob Morris	The Coastal Corporation
Norm Morrow	Exxon Chemical Americas
Bill Perdue	Pulaski Furniture Corporation
Susan Radomski	Eastern Research Group, Inc.
Paul Rahill	Industrial Equipment and Engineering Company
Jeff Shumaker	International Paper
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group
Scott Warner	Eastern Research Group
Bill Wiley	Consumat Systems, Inc.
Dana Worcester	Association of Container Reconditioners

ATTACHMENT 3

INCINERATOR WORK GROUP CALENDAR

<i>Sun</i>	<i>Mon</i>	<i>Tue</i>	<i>Wed</i>	<i>Thu</i>	<i>Fri</i>	<i>Sat</i>
<h1>September</h1>						
	Bullet list of CC review materials due	1	2 Subteam #2 mtg 1 - 8 pm	3 IWG meeting 8:30 am - 4	4 Postings due for CC	5
6	7 Federal Holiday	8	9	10	11 Hardcopies of CC review	12
13	14 Hardcopies (3) provided	15 Abbrev. IWG mtg (optional)	16 CC Meeting	17 CC Meeting	18	19
20 FACA expires	21	22	23	24	25	26
27	28	29	30			